

**National Pooling Administration**

**Contract #CON07000005**

**Change Order Proposal #24**

(Enhancement of the FTP Interface with the  
Pooling Administration System)

November 6, 2012

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## 1 Introduction

In accordance with Neustar's National Pooling Administration contract<sup>1</sup> and our constant effort to provide the best support and value to both the FCC and the telecommunications industry, Neustar, as the National Pooling Administrator (PA), hereby submits this change order proposal to the Federal Communications Commission (FCC) for approval. This change order complies with the contractual requirements set forth in Clause C.1 of the *Contract for Pooling Administration Services for the Federal Communications Commission*, effective August 15, 2007.

## 2 Issue

Over five years ago, the FCC awarded the National Pooling Administration contract to Neustar. Included in that document was the requirement, at Clause C, Section 3.1.4 that:

The contractor shall accommodate automated data output via File Transfer Protocol (FTP) to service providers when transmitting data from Appendix B, Reference 2, *INC TBPAG*, Attachment 3/Part 3, and other industry forms/data or reports.

The Pooling Administration System (PAS) has, for the past five years, accommodated this limited automated data output with an FTP protocol that complies with these requirements. However, over time, with technological advances in the industry, interest in using such an automated data transfer capacity has increased. The National Pooling Administrator has recently fielded various inquiries about use of a system-to-system process in a manner more consistent with that enabled by the Graphic User Interface (GUI), which provides for a variety of user needs that go beyond the industry forms and reports. Indeed, a recent inquiry was made about the possibility of using an application programming interface (API) to transfer information system-to-system. Accommodating a request to develop an API data transfer at this juncture would require a massive and expensive overhaul of the Pooling Administration System.

However, it has become apparent that it would be beneficial to our users to enhance the existing FTP interface beyond contract requirements to allow it to more closely conform to the GUI experience, incorporating into the available menu additional functions not linked to industry forms. If necessary, these enhancements could be accomplished on a piece-by-piece basis, implementing the various individual modifications as parts of regular PAS maintenance events and builds, as requirements are developed, and time becomes available to the System Engineering group.

## 3 Proposed Solution

We assessed the differences between the GUI functionality and the existing FTP interface with the PAS, and determined that the following proposed enhancements can be implemented. They

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<sup>1</sup> FCC Contract Number CON07000005

will have no effect on the existing GUI functions, which will still be available in their present form.

- **State Waiver Request** – The state waiver is an option on a growth block request that allows the SP or SP consultant to indicate that he or she has received a state waiver or needs a state waiver to receive the automatic Part 3 denial for a request that does not meet the Months-to-Exhaust (MTE) and/or Utilization requirements;
- **Block Reservations** - The block reservation is an individual growth block request type that allows an SP or SP Consultant to reserve individual thousands-blocks, pending a state waiver, for a request that does not meet the Months-to-Exhaust (MTE) and/or Utilization requirements.
- **Assign/Cancel/Extend Block Reservation** – An assign/cancel/extend block reservation request is a request type that allows an SP or SP Consultant to request the assignment, cancellation, or extension of an individual thousands-block that was previously reserved via a block reservation request.
- **Modify Pending Request** - A SP or SP Consultant may modify a new individual block request that was previously submitted if the PA has not yet begun to process the request, and the request was submitted in PAS less than 5 days prior.
- **Code Disconnect** – A code disconnect request allows an SP or SP Consultant to disconnect a pooled NPA-NXX (code).
- **Withdraw Pending Requests** – The withdraw pending request function allows an SP or SP consultant to cancel or withdraw a pending request (new block request, block modification, block disconnect, block reservation, assign/cancel block reservation, new code request, code modification or code disconnect) under certain permitted circumstances.
- **Create Part 4 for Dedicated Customer Request** – The Create Part 4 for a dedicated customer request is a CO Code Part 4 form that is submitted by SP or SP consultant for dedicated customer code requests.
- **Cancel Block Disconnect** – The cancel block function allows the SP or SP consultant user to cancel a previously submitted and approved block disconnect request as long as it is prior to the effective date of the block disconnect request.

## 4 Assumptions and Risks

Part of the Pooling Administrator's assessment of this change order is to identify the associated assumptions and consider the risks that can have an impact on our operations.

This change order affects only the FTP interface with PAS, and would have no negative impact on our day-to-day operations.

## **5 Cost**

The processes that are the subject of this change order already in use in the GUI, and the FTP interface already exists. Because the enhancements to the interface: (1) are a known functionality, and their use will decrease human error, (2) will reduce the amount of time that the pooling administrators may have to spend working with users to assist in correcting those errors, and (3) can, if necessary, be done piecemeal on an as-time-permits basis.

## **6 Conclusion**

This change order proposal presents a viable solution that addresses the inquiries received from external users of PAS and offers improved functionality beyond that required by the terms of our contract. We respectfully request that the FCC review and approve this change order proposal.